



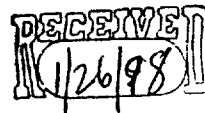
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January 15, 1998

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Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 "C" Street SW
Washington, DC 20204



Section 403(r)(6) Notification

Dear Sir or Madam:

In response to the courtesy letter received on November 19, 1996 from the FDA, suggesting that our previous statement for this product was a drug claim, **LEINER HEALTH PRODUCTS** notifies FDA that it is resubmitting the following restructured statement in accordance with the requirements of section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act:

This advanced formula contains important Antioxidants, such as, Vitamin C, E, Natural Beta Carotene and other carotenoids, Selenium, Zinc, Grape Seed, Tocotrienols and Hesperidin Complex that help protect cells from the harmful effects of free radicals.

Natural Trace Sea Minerals (Trace Mineral Complex) are newly recognized trace minerals that promote good health.

Herbs work in harmony with other nutrients. Ginkgo Biloba contains flavonglycosides that help maintain cerebral circulation and mental alertness. Ginseng helps release energy to aid in metabolism.

on the following product:

Your Life® Premium Multi-Vitamins with Herbs Supplement

Very truly yours,

LEINER HEALTH PRODUCTS

Gale Bensussen, President

cc: Michael Bradley, Director of Regulatory Affairs
William Cochran, Regulatory Affairs

975-0162

LET/1193